

EXHIBIT A

WESTON | PATRICK

By Federal Express

June 26, 2021

Ms. Lorraine E. Dauphinee
78 Selena Avenue
Belleville ON K8P4C4
Canada

Re: Michael Hall v. Lorraine Dauphinee
Barnstable Superior Court, Massachusetts, United States
Civil Action docket number: 2172CV00199

Dear Ms. Dauphinee,

My office represents Michael Hall, the Plaintiff in the captioned matter.

Enclosed you will find the Summons and a copy of the Complaint that has been filed against you in the Barnstable Superior Court, Massachusetts, United States. We recommend you read the enclosed documents carefully, and that you notify your counsel that you have been served.

The service is made upon you pursuant to Mass. R. Civ. P. 4(e)(3) which provides for service by "any form of mail addressed to the person to be served and requiring a signed receipt" where the person to be served is outside the Commonwealth of Massachusetts, read with Art. 10, Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters, commonly known as "Hague Service Convention":

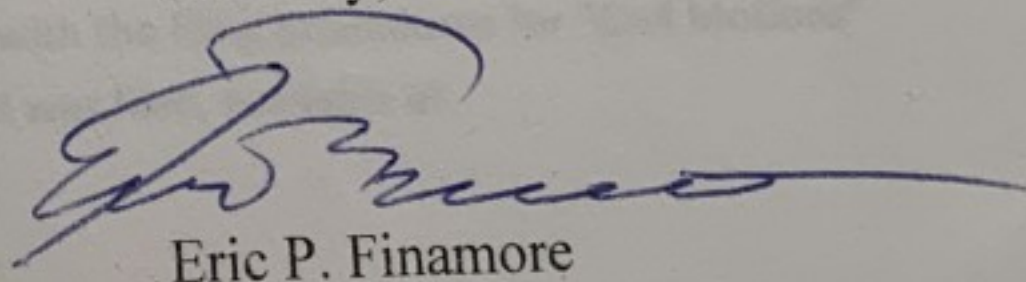
"Provided the State of destination does not object, the present Convention shall not interfere with—

a) the freedom to send judicial documents, by postal channels, directly to persons abroad,"

Thank you.

EPF/ca
Enclosures

Sincerely,



Eric P. Finamore

Commonwealth of Massachusetts

BARNSTABLE, SS.

TRIAL COURT OF THE COMMONWEALTH
SUPERIOR COURT DEPARTMENT
CIVIL DOCKET NO. 2172CV00199MICHAEL HALL, PLAINTIFF(S),

v.

LORRAINE DAUPHINEE DEFENDANT(S)

SUMMONS

THIS SUMMONS IS DIRECTED TO LORRAINE DAUPHINEE. (Defendant's name)

You are being sued. The Plaintiff(s) named above has started a lawsuit against you. A copy of the Plaintiff's Complaint filed against you is attached to this summons and the original complaint has been filed in the Barnstable Superior Court. **YOU MUST ACT PROMPTLY TO PROTECT YOUR RIGHTS.**

1. **You must respond to this lawsuit in writing within 20 days.** If you do not respond, the court may decide the case against you and award the Plaintiff everything asked for in the complaint. You will also lose the opportunity to tell your side of the story. You must respond to this lawsuit in writing even if you expect to resolve this matter with the Plaintiff. **If you need more time to respond, you may request an extension of time in writing from the Court.**
2. **How to Respond.** To respond to this lawsuit, you must file a written response with the court and mail a copy to the Plaintiff's Attorney (or the Plaintiff, if unrepresented). You can do this by:
 - a. Filing your **signed original** response with the Clerk's Office for Civil Business, Superior Court, by mail to P.O. Box 425, or in person to 3195 Main Street, Barnstable, MA 02630, AND
 - b. Delivering or mailing a **copy** of your response to the Plaintiff's Attorney/Plaintiff at the following address: ERIC FINAMORE, WESTON PATRICK, ONE LIBERTY SQ, STE 1210 BOSTON MA 02109 USA
3. **What to include in your response.** An "Answer" is one type of response to a Complaint. Your Answer must state whether you agree or disagree with the fact(s) alleged in each paragraph of the Complaint. Some defenses, called affirmative defenses, must be stated in your Answer or you may lose your right to use them in court. If you have any claims against the Plaintiff (referred to as **counterclaims**) that are based on the same facts or transaction described in the Complaint, then you must include those claims in your Answer. Otherwise, you may lose your right to sue the Plaintiff about anything related to this lawsuit. If you want to have your case heard by a jury, you must **specifically** request a jury trial in your Answer or in a written demand for a jury trial that you must send to the other side and file with the court no more than 10 days after sending your Answer. You can also respond to a Complaint by filing a "Motion to Dismiss," if you believe that the complaint is legally invalid or legally insufficient. A Motion to Dismiss must be based on one of the legal deficiencies or reasons listed under Mass. R. Civ. P. 12. If you are filing a Motion to Dismiss, you must also comply with the filing procedures for "Civil Motions" described in the rules of the Court in which the complaint was filed, available at www.mass.gov.courts/case-legal-res/rules of court.

4. **Legal Assistance.** You may wish to get legal help from a lawyer. If you cannot get legal help, some basic information for people who represent themselves is available at www.mass.gov/courts/selfhelp.
5. **Required information on all filings:** The "civil docket number" appearing at the top of this notice is the case number assigned to this case and must appear on the front of your Answer or Motion to Dismiss. You should refer to yourself as the "Defendant."

Witness Hon. Judith Fabricant, Chief Justice on JUNE 18, 2021. (SEAL)

Scott W. Nickerson
Clerk-Magistrate

Scott W. Nickerson

Note: The number assigned to the Complaint by the Clerk-Magistrate at the beginning of the lawsuit should be indicated on the summons before it is served on the Defendant.

PROOF OF SERVICE OF PROCESS

I hereby certify that on _____, 20____, I served a copy of this summons, together with a copy of the complaint in this action, on the defendant named in this summons, in the following manner (See Mass. R. Civ. P. 4 (d)(1-5)):

Dated: _____, 20____ Signature: _____

N.B. TO PROCESS SERVER:

PLEASE ENTER THE DATE THAT YOU MADE SERVICE ON THE DEFENDANT IN THIS BOX – BOTH ON THE ORIGINAL SUMMONS AND ON THE COPY OF THE SUMMONS SERVED ON THE DEFENDANT.

COMMONWEALTH OF MASSACHUSETTS

BARNSTABLE, SS.

**TRIAL COURT OF THE COMMONWEALTH
SUPERIOR COURT DEPARTMENT
CIVIL ACTION NO.**

MICHAEL HALL

Plaintiff,

V.

LORRAINE E. DAUPHINEE

Defendant.

COMPLAINT AND JURY CLAIM

1. The Plaintiff, Michael Hall, is a resident of West Falmouth, Barnstable County, Massachusetts.

2. The Defendant, Lorraine Dauphinee, is a resident of Belleville, Ontario, Canada.

3. On July 27, 2019, the Defendant owned a motor vehicle bearing Ontario registration AZYY870, and operated the said motor vehicle on a public way known as Wild Harbor Road within the town of Falmouth, Massachusetts.

4. On July 27, 2019, the Plaintiff, while in the exercise of due care, was travelling by bicycle in a southerly direction on a public way known as Old Main Road within the town of Falmouth, Massachusetts.

5. On July 27, 2019, at approximately 3:34 p.m. at the intersection of Wild Harbor Road and Old Main Road in Falmouth Massachusetts, the Defendant was so negligent and careless in the operation, use, control, and maintenance of her motor

vehicle that she caused it to strike the Plaintiff.

6. As a direct and proximate result of the Defendant's negligent operation of her motor vehicle, the Plaintiff was caused to suffer severe and permanent personal injuries, to suffer great pain of body and anguish of mind, to incur great expense for medical care and attendance, to suffer a loss of wages or earning capacity, and to suffer and incur other injuries, losses and damages.

7. The Defendant is not exempt from liability to the Plaintiff under the provisions of Mass. Gen. Laws, c.231, §6D.

WHEREFORE, the Plaintiff demands judgment against the Defendant in an amount of money damages which will be fair and adequate to compensate him for his injuries, damages and losses, plus interest, costs, attorney's fees and such other relief as is appropriate in consideration of the issues before this Court.

JURY CLAIM

Pursuant to Rule 38 of the Massachusetts Rules of Civil Procedure, the Plaintiff demands a trial by jury as to all issues raised in this action.

Plaintiff, Michael Hall,
By his attorneys,



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